

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JENNAYA BENNETT-WERRA,
Plaintiff,

v.

STEVEN TOMPKINS, et al.,
Defendants.

Civil Action No. 1:20-cv-10017-ADB

MOTION BY DEFENDANT NAPHCARE, INC. TO WAIVE LOCAL RULE 7.1(a)(2)

Defendant NaphCare, Inc. respectfully request that this Honorable Court exempt it from the requirements of Local Rule 7.1(a)(2). As grounds thereof, Defendant NaphCare, Inc. states that compliance with Local Rule 7.1(a)(2) would not be practicable, useful, and/or efficient. Local Rule 7.1(a)(2) states, “No motion shall be filed unless counsel certify that they have conferred and have attempted in good faith to resolve or narrow the issue.” However, any attempt to confer with the Plaintiff, an incarcerated *pro se* inmate, would be unduly burdensome and inefficient, and would likely serve to undermine the purpose of this Rule.

WHEREFORE, Defendant NaphCare, Inc. respectfully request that its *Motion* be allowed and the requirements of Local Rule 7.1(a)(2) waived with respect to communications between Counsel for Defendant NaphCare and Plaintiff.

Respectfully submitted,
 Defendant NaphCare, Inc.,

By its attorney,

/s/ William D. Saltzman
 William D. Saltzman, BBO #439749
 KOUFMAN & FREDERICK, LLP
 145 Tremont Street, 4th Floor
 Boston, MA 02111
 (617) 423-2212
 ws@kflitigators.com

Dated: May 21, 2020

CERTIFICATE OF SERVICE

I, William D. Saltzman, certify that on the 2st day of May, 2020, a copy of the above pleading was filed with the ECF System and sent electronically to the registered participants identified on the Notice of Electronic Filing, with paper copies being sent to those indicated as non-registered participants.

/s/ William D. Saltzman
William D. Saltzman

Z:\Clients\NaphCare, Inc\Bennett-Werra\Pleadings\5.21.20 Waive LR 7.1(a)(2).docx